

NetMind Life Services Privacy Policy

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This Privacy Policy explains how NetMind Life collects, uses, and protects your personal information when you use our web and iOS mobile applications, including sensitive health and genetic data, applies to personal data processed in connection with our digital services and does not cover data processed solely in connection with the purchase of physical goods or supplements, which may be subject to separate notices. Please read this Policy carefully alongside our [Terms and Conditions](#).

1. Who We Are

We are NetMind.AI Limited ('NetMind Life') of 6th floor, 75 King William St, London EC4N 7BE. We provide wellness, bridging the gap between intricate health insights and accessible, actionable strategies for all.

You can contact us at clientsupport@netmind.life or visit our website at <https://life.netmind.ai>.

2. What We Collect

When using the NetMind Life website, web application, or iOS app, we typically collect and use the following categories of personal data for the purposes set out below. When you access our web application, limited technical information may also be processed.

- **Personal Information:** Name, date of birth, and email address/contact details
- **Account information:** Registration details and app usage data
- **Billing and subscription information (web only):** subscription status, payment reference IDs, billing history, and customer identifiers provided by our payment service provider. We do **not** store full card details.
- Marketing preferences and communication history
- Records of consent, where appropriate
- **Lifestyle score data:** We generate and store a lifestyle score based on our calculation, derived from your response and tracker inputs
- **Ranking data:** Your chosen display name and score, if you opt into rankings feature.
- **Chatbot interactions:** The content of your questions and responses when using our AI chatbot, which is processed by XYZ solely to provide this functionality.
- **Genetic data:** where you choose to provide it, either by uploading it directly through our portal, or by authorising third-party providers who collaborate with us (such as laboratories or testing services) to share your genetic data with us.
- **Health data:** Blood biomarkers, Glycan Age, biological age indicators, and information access via Apple HealthKit and the Inbody API
 - **Apple HealthKit:** This may include body measurements (e.g. weight, height, BMI) and activity data (e.g. steps, calories burned, HRV), and other health-related metrics. We only access this data with your explicit permission, and it is never used for marketing or advertising purposes.

- **Inbody API:** We access and store body composition metrics, such as muscle mass, fat percentage, water balance and other fitness data. This data is retrieved strictly with your consent and used solely to generate personalised health insights.

The specific use and legal basis for each category of data are described in Section 4B.

3. How We Collect Your Personal Data

We typically collect your personal data directly from you during account registration and while using the app, as well as from third parties, such as at-home testing providers and blood test labs, but only with your consent. This may also include data collected automatically when you access our Services via a web browser.

3A. Children's data

Our Services are not intended for individuals under the age of 18, and we do not knowingly collect or process personal data relating to children.

If we become aware that we have collected personal data from a child under 18, we will delete it promptly.

If you believe a child has provided us with personal data, please contact us at clientsupport@netmind.life.

We do not knowingly collect age data to verify users' ages, and we rely on users to confirm that they meet the minimum age requirement.

4. Why We Use Your Personal Data

We will only use your personal data where we have a lawful basis to do so. Our lawful basis is:

- **Providing our Services:** where necessary for the performance of the contract between us or to take steps at your request prior to entering the contract.
- **Improving and developing our Services:** where necessary for the purposes of our legitimate interests in improving and developing our Services.
- **Marketing our Services and similar goods or services to you:** where necessary for the purposes of our legitimate interests in promoting our goods and services. Health and genetic data are **never** used to determine marketing content, marketing recommendations, targeting, or promotional messaging.
- **Included but not limited to:**
 - To calculate and update your daily lifestyle score
 - To provide leaderboard and ranking features, if you choose to participate
 - To deliver chatbot-based guidance and responses

We only use special categories of personal data (e.g. health and genetic data) with your consent. Certain optional features of our Services are available only if you voluntarily choose to provide health and/or genetic data. You are not required to provide such data to use the core features of the App. It is up to you whether to provide your consent, and you may withdraw your consent at any time, but we will be unable to provide our full range of Services without your consent. We may send you marketing to offer similar goods or services to those you are already receiving from us. You may opt

out from receiving marketing from us at any time. Otherwise, we will only send you marketing at your request or with your consent.

We are proud of using innovative automated technology, including artificial intelligence (AI), to provide the best possible services. This includes automated evaluation of your health and genetic data to make tailored recommendations to you. Our Services do not typically involve making solely automated decisions about you that have a legal or similarly significant effect. However, should we offer such a Service, we will explain this to you when offering the Service and only provide the Service with your consent.

For each category of personal data we process, we ensure that the purpose is specific and explicit, and that a lawful basis under UK GDPR and EU GDPR applies. We only process the minimum data necessary for each purpose.

4A. Rankings and Leaderboards

If you choose to participate in our rankings or leaderboard features, we will process and display your selected display name and related score. This information will be visible to other users of the App and, where indicated, to the public.

Participation is entirely voluntary and subject to your explicit consent, which you may withdraw at any time in the App. If you withdraw consent, your information will no longer appear in the rankings.

We process this information solely for the purpose of providing the rankings feature and do not use it for advertising or profiling.

4B. How Each Category of Data Is Used and Our Legal Bases

We process each category of personal data for specific purposes and under an appropriate lawful basis:

- **Personal information (name, contact details, date of birth):** used for account creation, identity verification, and providing our Services (legal basis: contract).
- **Account data and usage data:** used to operate, maintain, and improve the App (legal basis: legitimate interests).
- **Billing and subscription data:** used to manage subscriptions, process payments, provide access to paid features, handle renewals and cancellations, and maintain accounting records (legal basis: contract and legal obligation).
- **Health data (biomarkers, biological age metrics, HealthKit data):** used to generate personalised insights and recommendations (legal basis: explicit consent).
- **Genetic data:** used only if you choose to provide it, solely for personalised health insights (legal basis: explicit consent).
- **Lifestyle score and ranking data:** used to calculate your lifestyle score and, if you opt in, to display rankings (legal basis: consent).
- **Chatbot interaction data:** used to generate responses and improve functionality (legal basis: contract or legitimate interests, depending on context).
- **Marketing preferences:** used to manage communications with you (legal basis: legitimate interests or consent, depending on communication channel).

4C. Automated Processing and Artificial Intelligence

We use automated analysis and artificial intelligence to provide personalised insights based on your health, lifestyle and genetic data. These automated processes do not produce decisions that have legal or similarly significant effects.

AI-generated insights and recommendations are for general wellness purposes only and do not constitute medical advice. They are not intended to diagnose, treat, cure, or prevent any medical condition. Users should always consult a qualified healthcare professional for medical concerns.

5. Sensitive Data (Health & Genetic)

We will only process blood biomarker data, Glycan Age, biological age metrics, Apple HealthKit and InBody API data, and genetic data with your informed consent.

Lifestyle Score and ranking data are derived from your self-reported lifestyle and health inputs. These are used only to provide you with insights and optional leaderboard participation.

Genetic data is processed only with your explicit consent and solely for providing personalised insights. Genetic data is never used for advertising, profiling, or any purpose unrelated to the App's core features. We do not share genetic data with third parties without your explicit permission.

These data are strictly used to generate tailored health insights and is never shared without your permission. We do not use any health-related data for advertising or profiling purposes. All such information is securely stored and encrypted.

HealthKit Compliance Statement

Data obtained from Apple HealthKit is used solely to provide health and wellness features within the App. Such data is not shared with third parties for advertising, marketing, or data mining purposes and is never sold. Access to HealthKit data is strictly limited to features explicitly enabled by you and is subject to your express permission, which you may revoke at any time via your device settings.

For more detail on how we use special category data, please see Section 4B.

6. Data Sharing

We do not sell your data. We will not share your personal data with anyone else without your consent, subject to the limited exceptions set out below.

Payment service providers (web subscriptions only): to process subscription payments, renewals, refunds, and related billing administration.

We use trusted third-party service providers to support our operations. These include:

- Cloud hosting and infrastructure providers
- Analytics and performance monitoring tools
- Health test laboratories and processing partners
- Customer support platforms
- Auditors, accountants, and legal advisers
- Payment or billing service providers (if applicable)
- **NetMind AI Chatbot technology services (NetMind XYZ):** We use NetMind XYZ, a multi-agent AI platform, to operate our chatbot functionality and process user-submitted queries. XYZ acts strictly as our data processor and processes personal data only to provide the

chatbot service on our behalf. XYZ is contractually prohibited from using personal data for its own purposes, model training, or advertising. Where XYZ processes data outside the UK or EEA, we ensure appropriate safeguards are in place, including the International Data Transfer Agreement (IDTA), the UK Addendum to the EU Standard Contractual Clauses (SCCs), or another lawful transfer mechanism. XYZ does not retain, store, or use personal data to train its own models and processes all data solely to operate the chatbot functionality on our behalf. User-submitted inputs and chatbot-generated outputs are processed solely to provide the chatbot functionality within the App. Such data is **not used** to train artificial intelligence or machine learning models and is not retained by the chatbot provider for any independent purpose.

Each processor acts solely on our instructions and is contractually required to keep your data secure.

We may use data processors to provide our Services. Our data processors act on our behalf and in accordance with our instructions. Our data processors are not permitted to use your personal data for any other purpose. We vet our data processors and enter a contract with them to ensure that they have appropriate measures in place to keep your personal data secure.

We may share limited leaderboard data (your nickname and score) with other users of the App or the public, if you opt in to rankings feature and provide consent to join. We may share personal data with our lawyers, accountants and auditors in the normal course of our business or in the event of a legal dispute. We may share personal data with regulatory or tax authorities, where necessary for regulatory or tax purposes. We may share personal data in connection with a corporate transaction concerning Netmind.AI Limited, such as restructure, takeover, merger or acquisition. We may share personal data where we are legally required to do so, for example in accordance with a court order. In all cases we will only share such personal data as is necessary for such purposes.

7. Where Your Data Is Stored

Your personal data is kept securely within the United Kingdom (UK). Neither we, nor our data processors, will transfer your personal data outside of the UK unless legally permitted with suitable protections in place.

If we transfer your personal data outside the UK or European Economic Area, we will ensure appropriate safeguards are in place, such as an adequacy decision, the UK International Data Transfer Agreement (IDTA), the UK Addendum to the EU Standard Contractual Clauses (SCCs), or another lawful transfer mechanism.

We will keep your personal data for so long as necessary to fulfil the purposes outlined in this Policy. Typically, we retain data for six years after you stop using our services, where required for legal, regulatory or tax reasons. You may request erasure of your data at any time.

7A. Who Can Access Your Data Within Our Organisation

Access to your personal data is limited to authorised staff who require it to perform their duties. This may include engineering, operations, and customer support teams. Access is controlled through role-based permissions and reviewed regularly. All staff are bound by confidentiality obligations and receive appropriate data protection training.

7B. How We Protect Your Data

We implement a range of technical and organisational measures to protect your personal data, including encryption in transit and at rest, access controls, secure development practices, continuous monitoring, and incident response procedures. We regularly review these measures to ensure they remain effective. We limit access to special category data (such as health and genetic data) to staff with a strict need to know.

All data transmissions between your device and our servers are protected by industry-standard encryption (HTTPS with TLS 1.3). All sensitive identifiers (including user ID, email, and phone number) are encrypted at rest using Fernet symmetric encryption (AES-128 with HMAC-SHA256 authentication). Encryption keys are securely stored in environment variables and are never hardcoded in our application code.

We follow the principle of data minimisation, collecting and retaining only the data strictly necessary to deliver and improve our services.

8. Your Data Protection Rights

Under data protection law, you have rights including:

- **Access:** you have the right to ask us for copies of your personal data.
- **Rectification:** you have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Erasure:** you have the right to ask us to erase your personal data in certain circumstances.
- **Restriction of processing:** you have the right to ask us to restrict the processing of your personal data in certain circumstances.
- **Object:** you have the right to object to the processing of your personal data in certain circumstances.
- **Data portability:** you have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.
- **Withdraw consent:** when we use consent as our lawful basis you have the right to withdraw your consent.

Usually, you do not need to pay a fee to exercise your rights and we have one calendar month to respond to you. Please note that the law allows us to charge a fee, refuse your request or take more time to respond in specified circumstances.

To exercise your rights, please contact us at clientsupport@netmind.life. You may request deletion of your account and personal data at any time through the in-app settings or by emailing us. Once verified, we will delete your data in accordance with applicable law.

9. Cookies Policy

Cookies and Similar Technologies

Our website, web application, and iOS app use essential cookies, local storage, and similar technologies to enable secure login, maintain sessions, and remember user preferences (such as language and display settings).

We do not use cookies or similar technologies for advertising purposes. Analytics or non-essential cookies will only be used where permitted by law and, where required, with your consent.

You can manage cookie preferences through your browser settings or, where applicable, via in-app controls.

10. Contact & Complaints

If you have any concerns about how your data is used, please contact us at clientsupport@netmind.life.

If you remain unsatisfied after contacting us, you may lodge a complaint with the UK's data protection authority:

Information Commissioner's Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>